

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

Richard MOLINA SANIPATIN,

Petitioner;

v.

Pamela BONDI, Attorney General, U.S. Department of Justice; Kristi NOEM, Secretary of the U.S. Department of Homeland Security; Pete R. FLORES, Acting Director, U.S. Customs and Border Protection; Juan G. BERNAL,

Chief Patrol Agent of Houlton Sector; Scott NICHOLS, Sr., Sheriff, Franklin County Detention Center,

Respondents.

Case No. 1:25-cv-00107-SDN

**UNOPPOSED MOTION TO TRANSFER VENUE
TO THE DISTRICT OF NEW HAMPSHIRE WITH INCORPORATED
MEMORANDUM OF LAW**

Petitioner, Richard Molina Sanipatin moves this Court to transfer this matter to the District of New Hampshire. In support of this motion, Petitioner states the following:

1. Petitioner commenced this action, seeking a writ of habeas corpus directing Respondents to release him from custody, alleging that he was being unlawfully held in the Franklin County (Maine) Detention Center.
2. On March 25, 2025, Petitioner has been moved by Respondents from Franklin County Detention Center to Strafford County Correctional Facility located in Dover, New Hampshire.

3. The change in Petitioner's current location causes the U.S. District Court for the District of New Hampshire to become the proper venue and jurisdiction in this matter, in the interest of justice. *Tham v. Adducci*, 319 F. Supp. 3d 574 (D. Mass. 2018).
4. Assistant U.S. Attorney John Osborne has advised the undersigned that the United States does not oppose this motion.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court:

- 1) Grants this Motion to Transfer Venue;
- 2) Transfer this matter to the U.S. District Court for the District of New Hampshire; and
- 3) Grant any other and further relief that this Court deems just and proper.

Dated at Portland, Maine this 28th Day of March, 2025.

Respectfully Submitted,

/s/ Melissa A. Hewey
Melissa A. Hewey
Attorney for Petitioner

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(pro hac vice petition forthcoming)